

Court Ex. # 15
11-25-15
Am. B.

November 25, 2015

U.S. District Judge Valerie Caproni
Southern District of New York
40 Foley Square, Courtroom 443
New York, NY

USDC SDNY
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Dear Judge Caproni:

I am a reporter for Newsday covering the trial of U.S. v. Sheldon Silver, 15CR00093, before you. I am writing to request unredacted copies of all juror notes so that the jurors involved are identified, and press access to any meeting with a juror as sought in the note marked as Court Exh. 11.

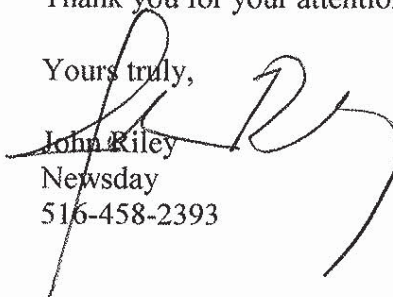
As you know, the public and the press have a presumptive right of access to judicial documents and court proceedings under both the common law and the Constitution. This right extends to juror notes and hearings involving jurors.

I appreciate your many accommodations of the press during the pre-trial and trial phases of this case. As the current situation evolves, the identity of the jurors who write notes may become crucial to public understanding of the outcome of the case. And observation of the demeanor of the juror who wrote Exh. 11 may be equally critical.

If you prefer any meeting to occur in the robing room, as you suggested on Nov. 24, I believe the press could agree on two "pool" reporters who would fill in everyone else, to keep the meeting more intimate.

Thank you for your attention to this request.

Yours truly,


John Riley
Newsday
516-458-2393